

**MOSS LAW GROUP**

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Attorneys for Defendant CHARLES KLASKY

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

CHARLES KLASKY,

Defendant.

Case No. CR 17-401-DMG

Honorable Dolly M. Gee

**STIPULATION REGARDING  
REQUEST FOR CONTINUANCE OF  
SENTENCING DATE**

Current Sentencing Date:

January 12, 2022 at 11:00 a.m.

Proposed Sentencing Date:

May 25, 2022 at 11:00 a.m.

Location:

Courtroom of the

Honorable Dolly M. Gee

Plaintiff United States of America, by and through its counsel of record, Assistant United States Attorneys Kristen A. Williams and Cathy J. Ostiller, and defendant Charles Klasky, by and through his counsel of record, William Fleming, hereby stipulate as follows:

1. On or about July 5, 2017, the government filed an information charging defendant with one count of conspiracy to commit health care fraud in violation of Title 18, United States Code, Section 371.

2. On August 9, 2017, defendant pled guilty to the single-count information. Sentencing was initially set for November 15, 2017, but has since been continued, most recently to January 12, 2022.

1           3.     The Probation Officer has not yet disclosed the Presentence Report to the  
2 parties and, pursuant to Federal Rule of Criminal Procedure 32(e)(2), is not yet obligated  
3 to do so.

4           4.     Pursuant to his plea agreement, defendant is currently cooperating with the  
5 government regarding United States v. Omidi, et al., CR 17-661(A)-DMG. Defendant is  
6 scheduled to testify at the trial of that case. A continuance of the sentencing will allow  
7 the government to take defendant's full cooperation and testimony into account before  
8 taking a position as to defendant's sentencing in this matter.

9           5.     Defense counsel, William C. Fleming, Jr., shall be engaged in a state  
10 criminal jury trial (People v. Hoffman, Orange County Superior Court Case No.  
11 14CF0243) which is scheduled to commence on November 3, 2021. The time estimate  
12 for this trial is three (3) months. Thereafter, Mr. Fleming shall be engaged in a state civil  
13 case jury trial (People ex rel. ILWU-PMA Welfare Plan v. Amador, et al., Los Angeles  
14 Superior Court Case No. BC672072) which is scheduled to commence on April 19, 2022.  
15 Therefore, Mr. Fleming is unavailable until mid to late May 2022.

16           6.     Accordingly, by this stipulation, the parties jointly move to continue the  
17 sentencing date from January 12, 2022 to May 25, 2022.

18           IT IS SO STIPULATED.

19           Dated: October 15, 2021

TRACY L. WILKISON  
Acting United States Attorney  
SCOTT M. GARRINGER  
Assistant United States Attorney  
Chief, Criminal Division

22           /s/ Kristen A. Williams  
KRISTEN A. WILLIAMS  
CATHY J. OSTILLER  
ALEXANDER C.K. WYMAN  
Assistant United States Attorneys

25           Attorneys for Plaintiff  
UNITED STATES OF AMERICA

1 Dated: October 15, 2021

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2  
3 /s/ William C. Fleming, Jr.  
William C. Fleming, Jr., Esq.

4 Attorneys for Defendant, CHARLES KLASKY